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February 24, 2021

SENT VIA ECF

Hon. John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: United States v. Aviram Azari
1:19 Cr. 00610 (JGK)**

Dear Judge Koeltl:

On behalf of my client Aviram Azari, and with the government's consent, we would most respectfully request that the conference scheduled for February 26th, 2021 be rescheduled to a date and time convenient to the Court, the week of April 12, 2021, or to a date thereafter.

I make this request because we are continuing our review of discovery, and upon completion we would like an opportunity to engage in meaningful plea negotiations.

We have been delayed because of the volume of discovery, language-translation issues, limitations on Mr. Azari's access to all of his discovery without counsel's actual presence, coupled with the MCC's inability to provide operational computers to view the relatively little amount of discovery he is permitted to maintain. Much of these delays seem to have arisen from Covid-related restrictions and protocol.

On behalf of Mr. Azari, we waive speedy trial time based on the reasons contained within this request and in the interests of justice.

The Court's consideration is greatly appreciated.

Respectfully,

/s/ Barry S. Zone

Barry S. Zone

cc: AUSA Eun Young Choi
AUSA Olga Zverovich
AUSA Juliana Murry